

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JERREIL LAMOUNTA MARTIN,

Defendant.

**INDICTMENT**

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The Grand Jury charges:

**Count 1**

(False Statement During Purchase of Firearms)

On or about September 2, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

in connection with the acquisition of firearms, specifically a Keltec PF-9 9mm pistol, an HS Produkt XDM .45 caliber pistol, and an HS Produkt XDS 9mm pistol, from Silver Bullet Firearms, a licensed dealer of firearms, knowingly made a false or fictitious written statement to Silver Bullet Firearms. This statement was intended and likely to deceive Silver Bullet as to a fact material to the lawfulness of the sale of the said firearms to the defendant under Chapter 44 of Title 18 of the United States Code, in that the defendant falsely represented on the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, that the defendant was the actual buyer of the firearms and he was not acquiring the firearms on behalf of another person.

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

**Count 2**

(Engaging in the Business of Dealing Firearms Without a License)

On or about September 2, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in firearms, namely a Keltec PF-9 9mm pistol, an HS Produkt XDM .45 caliber pistol, and an HS Produkt XDS 9mm pistol.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 921(a)(11)

18 U.S.C. § 924(a)(1)(D)

**Count 3**

(False Statement During Purchase of Firearms)

On or about September 2, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

in connection with the acquisition of firearms, specifically a Taurus G2C 9mm pistol, another Taurus G2C 9mm pistol, and a Smith & Wesson M&P Shield .40 caliber pistol, from Al and Bob's Sports, a licensed dealer of firearms, knowingly made a false or fictitious written statement to Al and Bob's Sports. This statement was intended and likely to deceive Al and Bob's Sports as to a fact material to the lawfulness of the sale of the said firearms to the defendant under Chapter 44 of Title 18 of the United States Code, in that the defendant falsely represented on the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, that the defendant was the actual buyer of the firearms and he was not acquiring the firearms on behalf of another person.

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

**Count 4**

(Engaging in the Business of Dealing Firearms Without a License)

On or about September 2, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in firearms, namely a Taurus G2C 9mm pistol, another Taurus G2C 9mm pistol, and a Smith & Wesson M&P Shield .40 caliber pistol.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 921(a)(11)

18 U.S.C. § 924(a)(1)(D)

**Count 5**

(False Statement During Purchase of Firearms)

On or about September 4, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

in connection with the acquisition of firearms, specifically a Ruger Sec9 9mm pistol, a Ruger 57 5.7 caliber pistol, a Girsan MC28SA 9mm pistol, and a Glock 23Gen5 .40 caliber pistol, from Silver Bullet Firearms, a licensed dealer of firearms, knowingly made a false or fictitious written statement to Silver Bullet Firearms. This statement was intended and likely to deceive Silver Bullet as to a fact material to the lawfulness of the sale of the said firearms to the defendant under Chapter 44 of Title 18 of the United States Code, in that the defendant falsely represented on the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, that that the defendant was the actual buyer of the firearms and he was not acquiring the firearms on behalf of another person.

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

**Count 6**

(Engaging in the Business of Dealing Firearms Without a License)

On or about September 4, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in firearms, namely a Ruger Sec9 9mm pistol, a Ruger 57 5.7 caliber pistol, a Girsan MC28SA 9mm pistol, and a Glock 23Gen5 .40 caliber pistol.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 921(a)(11)

18 U.S.C. § 924(a)(1)(D)

**Count 7**

(False Statement During Purchase of Firearms)

On or about October 5, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

in connection with the acquisition of firearms, specifically an HS Produkt Hellcat 9mm pistol, from Silver Bullet Firearms, a licensed dealer of firearms, knowingly made a false or fictitious written statement to Silver Bullet Firearms. This statement was intended and likely to deceive Silver Bullet as to a fact material to the lawfulness of the sale of the said firearm to the defendant under Chapter 44 of Title 18 of the United States Code, in that the defendant falsely represented on the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, that the defendant was the actual buyer of the firearms and he was not acquiring the firearms on behalf of another person.

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)



**Count 8**

(Engaging in the Business of Dealing Firearms Without a License)

On or about October 5, 2021, in Kent County, in the Southern Division of the Western District of Michigan,

**JERREIL LAMOUNTA MARTIN,**

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, namely an HS Produkt Hellcat 9mm pistol.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 921(a)(11)

18 U.S.C. § 924(a)(1)(D)

**FORFEITURE ALLEGATION**

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

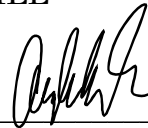
Upon conviction the offense in violation of 18 U.S.C. § 922(a)(6), as set forth in Counts 1, 3, 5, and 7 of this Indictment, or an offense in violation of 18 U.S.C. § 922(a)(1)(A), as set forth in Counts 2, 4, 6, and 8 of this Indictment, or,

**JERREIL LAMOUNTA MARTIN**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the offense, including, but not limited to: a Keltec PF-9 9mm pistol, an HS Produkt XDM .45 caliber pistol, an HS Produkt XDS 9mm pistol, a Taurus G2C 9mm pistol, another Taurus G2C 9mm pistol, a Smith & Wesson M&P Shield .40 caliber pistol, a Ruger Sec9 9mm pistol, a Ruger 57 5.7 caliber pistol, a Girsan MC28SA 9mm pistol, a Glock 23Gen5 .40 caliber pistol, and a HS Produkt Hellcat 9mm pistol, and associated ammunition.

18 U.S.C. § 924(d)(1)  
28 U.S.C. § 2461(c)  
18 U.S.C. § 922(a)(1)(A)  
18 U.S.C. § 922(a)(6)

A TRUE BILL



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GRAND JURY FOREPERSON

MARK A. TOTTON  
United States Attorney



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ERIN K. LANE  
Assistant United States Attorney